

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CISCO SYSTEMS, INC., a California Corporation, CISCO TECHNOLOGY, INC., a California Corporation

Case No. 4:19-cv-07562-PJH

Plaintiffs,

v.

WILSON CHUNG, JAMES HE, JEDD WILLIAMS, and THOMAS PUORRO, individuals, and PLANTRONICS, INC. dba POLY, a Delaware Corporation

Defendants.

JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and in accordance with Plaintiffs Cisco Systems, Inc. and Cisco Technology, Inc.’s (collectively, “Cisco”) and Defendant Jedd Williams’ (“Mr. Williams”) confidential settlement agreement (the “Agreement”), Cisco’s claims against Mr. Williams in the above-captioned action are dismissed with prejudice.

In accordance with the Agreement, notwithstanding Cisco’s dismissals with prejudice as to Mr. Williams, Cisco reserves all rights and claims against Defendants Plantronics, Inc., Wilson Chung, and Thomas Puorro (collectively, the “Remaining Defendants”) arising from direct liability for their own acts, conduct, and/or inaction, and arising from indirect liability, vicarious liability, and liability under the doctrine of *respondeat superior* for the acts, conduct, and/or inaction of others. Also in accordance with the Agreement, Cisco’s dismissals with prejudice as to Mr. Williams shall have no preclusive effect, whether under the doctrines of collateral estoppel, claim preclusion, res judicata, issue preclusion or otherwise, on Cisco’s rights and claims against the Remaining Defendants.

Each party shall bear its own costs, expenses, and attorneys' fees.

Dated: November 22, 2021

/s/ Steven Balcof

Steven Balcof

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It is so ORDERED:

Dated: November 30, 2021



CERTIFICATE OF CONCURRENCE

I am the ECF user whose ID and password are being used file the Stipulated Voluntary Dismissal and [Proposed] Order. I hereby attest that Jon Dean, counsel for Jedd Williams, has concurred in this filing.

Dated: November 22, 2021

By: /s/ Steven Balcof